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Dr. Jane Summerson, EIS Document Manager (M/S 010) Yucca Mountain Site Characterization Office DOE-Office of Civilian Radioactive Waste Management P.O. Box 30307 North Las Vegas, NV 89036-0307

RE: Yucca Mountain

Dear Ms. Summerson:

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The Supplemental EIS offers an analysis of the newest plans for the Yucca Mountain radioactive waste repository. The current plans remain inadequate to protect human health and the environment. The hydrology, the geochemistry and the mechanical stability of the area have proven unpredictable and unstable despite DOE's best efforts to deny the facts. The location is not geologically stable. It cannot be denied. This project should not go forward.

The radioactive waste will generate temperatures capable of heating surrounding rock to 205 degrees farenheit. The radioactive potential and the heat generated from storage of this waste will have unknown effects on the ecosystem, hydrology, geology and possibly the climate of the area. Too many questions remain unanswered because an experiment of this scope has not been done before, and is too risky to conduct now.

Such a large concentration of waste in one place—11,000 to 17,000 waste packages containing about 70,000 metric tons of uranium and plutonium—magnifies the risk of calamity from natural or human causes—even what might be a small and "manageable" misfortune can become a colossal tragedy when this much radioactivity is in one place.

Humankind has no adequate history of managing a waste site or a structure continuously for 300 years – let alone 10,000. Our nation has not existed for the amount of time the DOE proposes the site should need ventilation. Wires in electrical systems from the turn of the century have corroded in St. Louis' World's Fair homes. Steel structures from just 150 years ago have rusted into the dirt. Governments, societies and technologies have come and gone in less than 300 years. How can we expect the infrastructure of Yucca Mountain to remain intact, especially given the area's history of seismic activity?

- Further, since many of the plans for this facility remain "under consideration" the EIS cannot adequately examine the environmental impacts and therefore cannot be deemed complete.
- 5... The Yucca Mountain repository is no solution to the radioactive waste problem. Its operation and construction would generate its own quantity of waste, and in so doing,

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adds nothing but additional problems to the one it attempts to solve. It will encourage further dependence on outdated, outmoded and unsafe nuclear power and result in 30-50 years of continued waste generation – again adding to the problem it attempts to solve.

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And finally, if the DOE has permitted the facilities that generate this waste, then they should be confident in the generators' ability to safely store the waste on site. Otherwise the permits should be revoked and the generators decommissioned. On site storage at the site of generation protects public health and the environment the most by preventing nearly daily shipments of high level radioactive waste through the communities, the farmlands and over the waterways of this nation and particularly of our city and our state which would bear some of the largest risks in the transportation of the waste.

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For these reasons and more, I again urge the DOE to reconsider this wasteful, expensive, and dangerous plan before it goes any further. Our money and resources are better spent finding genuine solutions for radioactive waste and safer energy alternatives. That is the challenge we must embrace rather than making more attempts to force the Yucca Mountain plan to appeal to sanity.

Please send me the full EIS.

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Sincerely,

Kathleen Logan Smith